

WYOMING CITIZEN PARTICIPATION PLAN WYOMING, MICHIGAN

Introduction

The following Citizen Participation Plan (CPP) sets forth the City of Wyoming's (City) policies and procedures to provide its residents with adequate opportunities to participate in the development, implementation and evaluation of the Consolidated Housing and Community Development Plan (CHCDP). The CHCDP consists of a five-year plan and one-year plans which identify the housing and economic needs of the city, prioritizes those needs and formulates an implementation strategy to address the needs based on available funds. The CPP also includes the policies and procedures to provide the City's residents with adequate opportunities to participate in the development of the Analysis of Impediments to Fair Housing Choice (AI) or the Assessment of Fair Housing (AFH) as may be statutorily required. These reports, through community participation, identifies fair housing issues and related contributing factors, and results in prioritizing and setting of goals for the upcoming planning period.

I. General

A. Requirement to Adopt

The City is required to adopt a CPP in order to apply for and spend Federal Department of Housing and Urban Development Community Development Block Grant (CDBG) funds [24CFR91.105(a)], and any affiliated grants of any nature issued in response to urgent and emergency needs, such as those authorized by *The Coronavirus Aid, Relief and Economic Security Action* (CARES Act) (Public Law 116-136) known as CDBG-CV grants. Additionally, the CCP shall apply to those funds made available to the City for applicable Michigan State Housing Development Authority grants as may arise.

This plan complies with the citizen participation requirements related to Assessment of Fair Housing (AFH) added by the HUD July 16, 2015 final rule. Further, this plan is amended to allow for the waiver and amendments to any statute or regulation that the Secretary of HUD deems appropriate and necessary in connection with the CDBG-CV funds, FY 2019 and FY 2020 CDBG funds. HUD has waived 24 CFR 91.505 to facilitate the use of the CDBG-CV funds to the extent necessary to require submission of a substantial amendment to HUD for review in accordance with 24 CFR 91.500.

B. Encouragement of Resident Participation

1. General

The City will encourage its residents to participate in the development of the CHCDP, any amendments to the plan and the plan's performance report, the AI and/or AFH and any revisions to the AI and/or AFH. The City will encourage

resident participation through a Community Development Committee (CDC) appointed by the City Council. The CDC shall be made up of 9 City residents which will represent the City at large. The CDC will recommend an annual CHCDP to the City Council, along with any amendments. The CDC will also recommend the AI and/or AFH to the City Council, along with any revisions.

- Pursuant to HUD's waiver of 24 CFR 91.505 to facilitate the use of the CDBG-CV funds to the extent necessary to require submission of a CHCDP or its substantial amendment to HUD for review in accordance with 24 CFR 91.500, the City may implement any expedited procedure to draft, propose, or amend consolidated plans it deems reasonable to meet an urgent or emergency need.
 - Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on action plan amendments and amended citizen participation plans.
 - In person public hearings shall not be required. Public hearing requirements may be met with virtual public hearings if:
 - 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and
 - 2) virtual hearings provide reasonable notification and access for residents.

2. Low- and Moderate-Income Persons

The City will encourage participation by low- and moderate-income persons city-wide and in predominantly low- and moderate-income areas where CDBG funds are proposed to be used. The City will also take whatever actions deemed necessary to encourage the participation of all its residents, including minorities, non-English speaking persons and persons with disabilities.

3. Consultation with Public and Private Agencies

When preparing the CHCDP and AI/AFH, the City will consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. This includes, but is not limited to, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations. The City will consult with community-based and regionally based organizations that represent protected class members and organizations that enforce fair housing laws. The City will also consult with regional government agencies in addition to adjacent units of general local government and local government agencies with metropolitan-wide planning and transportation responsibilities.

4. Consultation with Public Housing Agencies

The City will consult with the public housing authority (PHA) for the City of Wyoming to consider public housing needs, planned programs and activities under the CHCDP. The City will also consult with the PHA on the AI/AFH, on strategies for affirmatively furthering fair housing, and on proposed actions to affirmatively further fair housing in the CHCDP. The consultation will help provide a better basis for the certification by the authorized officials that the PHA Plan is consistent with the CHCDP and the City's description of its strategy for affirmatively furthering fair housing.

5. Public Housing Residents

The City encourages, in conjunction with PHA consultation, the participation of residents of public and assisted housing developments, including any resident advisory boards, resident councils, and resident management corporations, in the process of developing and implementing the CHCDP and AI/AFH. The City will make an effort to provide information to the PHA about the CHCDP, AI/AFH and Affirmatively Furthering Fair Housing strategy for the PHA Plan.

6. Resident Comments on CPP

When urgent or emergency needs are not present, the City will provide residents reasonable opportunity to comment on the CPP and any amendments through public hearings with a 15-day published public notice. The CPP will be available to the public at the Wyoming City Offices, 1155 28th St SW Wyoming MI 49509, and the Wyoming Public Library, 3350 Michael SW Wyoming MI 49509. The plan will also be posted on the City's website. The CPP will be in a format accessible to persons with disabilities, upon request.

II. Resident Participation in the Development of the Consolidated Housing and Community Development Plan (CHCDP) and Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH)

A. General

This section sets forth the policies and procedures concerning resident participation for the development of the CHCDP and AI/AFH.

B. Requirements for Development of the CHCDP and AI/AFH

1. Items to be Included in Notices

At the beginning of the public participation process (or soon as feasible after), the City will make available to the public, residents, public agencies and other interested parties any HUD-provided data and other supplemental information the City plans to incorporate into its CHCDP and AI/AFH. As regulatorily necessary, HUD-provided data will be cross-referenced to the data on

HUD's website. Before the City adopts a CHCDP, the City will make available to residents, public agencies and other interested parties information that includes the amount of assistance the City expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. The City will also address the proposed strategies and actions for affirmatively furthering fair housing consistent with the AI/AFH.

2. Plans to Minimize Displacement

Consistent with the goals and objectives of activities assisted under the Housing and Community Development Act of 1974, as amended, the City will take the following steps to minimize the displacement of persons from their homes:

- a. For development projects, alternate designs will be developed and extra weight will be given to alternatives having fewer displaced persons.
- b. Priorities will be given to those projects with vacant structures.
- c. Significant displacement will occur only when City officials believe that there is significant neighborhood value gained with the project.
- d. Residents displaced shall have priority in obtaining available subsidized housing units.

3. Availability of Proposed Plan Information

The proposed CHCDP and AI/AFH will be available at the Wyoming City offices, the Wyoming Public Library and the City's website.

C. Publishing and Disseminating Proposed CHCDP and AI/AFH Information

Prior to adoption by the City Council, a summary of the CHCDP and AI/AFH will be published in a newspaper of general circulation and will also be available at the Wyoming City Offices, Wyoming Public Library and the City's website. The summary will describe the content and purpose of the CHCDP and AI/AFH and will include a list of the locations where copies of the entire proposed CHCDP and AI/AFH may be examined. The City will provide a reasonable number of free copies of the CHCDP and AI/AFH to residents and groups that request it.

D. Public Hearing for Proposed CHCDP and AI/AFH

When urgent or emergency needs are not present, at least one public hearing will be held during the development phase of the proposed CHCDP and AI/AFH. The required public hearing must occur before the proposed CHCDP and AI/AFH is published for comment.

E. Comment Period

When urgent or emergency needs are not present, the City will provide a period, of not less than 30 calendar days, to receive comments from residents on the proposed CHCDP and AI/AFH.

F. Resident Comments on Proposed CHCDP and AI/AFH

The City will consider any comments or views of residents received in writing, or orally at public hearings, in preparing the final CHCDP and AI/AFH. The public comments received regarding the AI/AFH will be used to obtain the views of the community on AI/AFH-related data and affirmatively furthering fair housing in the City's housing and community development programs. A summary of all comments or views will be attached to the final CHCDP and AI/AFH.

III. Amendments to the CHCDP

A. Criteria for Amendment

An amendment to the CHCDP is required whenever there is a "substantial change" in the purpose, scope, location or beneficiaries of an activity. This includes substantial changes in the use of CDBG funds from one eligible activity to another. A "substantial change" occurs whenever one or more of the following factors are in evidence:

1. Purpose: The scope changes, as noted in No. 2 below.
2. Scope: The dollar amount of an activity change exceeds 25 percent of the applicable fiscal year's CDBG grant.

B. Notice and Opportunity to Comment

A notice in a newspaper of general circulation will be published when considering an amendment to the CHCDP. The City will provide a period, of not less than 30 calendar days, to receive comments from residents on the proposed amendment.

C. Summary of Comments

The City will consider any comments or views of residents received in writing, or orally at public hearings, in preparing an amendment to the CHCDP. A summary of all comments or views will be attached to the amendment of the CHCDP.

IV. Revisions to the AI/AFH

A. Criteria for Revisions to the AI/AFH

A revision to the AI/AFH is required whenever there is a material change in circumstances in the City that affects the information on which the AI/AFH is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances.

B. Notice and Opportunity to Comment

A notice in a newspaper of general circulation will be published when considering a revision to the AI/AFH. The City will provide a period, of not less than 30 calendar days, to receive comments from residents on the proposed revision.

C. Summary of Comments

The City will consider any comments or views of residents received in writing, or orally at public hearings, in preparing a revision to the AI/AFH. A summary of all comments or views will be attached to the revision of the AI/AFH.

V. CHCDP Performance Reports

A. Notice and Opportunity to Comment

A notice in a newspaper of general circulation will be published concerning the CHCDP performance report. The City will provide a period, of not less than 15 calendar days, to receive comments from residents on the CHCDP performance report.

B. Summary of Comments

The City will consider any comments or views of residents received in writing, or orally at public hearings, in preparing the CHCDP performance report. A summary of all comments or views will be attached to the CHCDP performance report.

VI. Public Hearings

A. General

When urgent or emergency needs are not present, the City will hold a minimum of two public hearings per year to obtain residents' views and to respond to proposals and questions, one at the development stage and one at the final stage. The first hearing will be held to obtain resident comments on housing and community development needs and development of proposed activities prior to final adoption of the CHCDP, or the proposed AI/AFH as applicable. The second hearing will be held to review and obtain resident comments on the program's performance, namely the Consolidated Annual Performance and Evaluation Report (CAPER).

The public hearings, together, will address housing and community development needs, development of proposed activities, proposed strategies and actions for

affirmatively furthering fair housing consistent with the AI/AFH, and review of program performance.

B. Notice

Notices for these meetings will be published in a newspaper of general circulation.

C. Times and Locations

When urgent or emergency needs are not present, these notices will be published not less than 15 calendar days prior to each hearing and will be posted at the Wyoming City Offices, the Wyoming Public Library and the City's website.

D. Needs of Non-English-Speaking Residents

The City will take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English-speaking and limited English proficiency residents of the community by providing translators at Wyoming City Hall. The translators may assist with translation of notices and other vital documents. When a significant number of non-English speaking residents can be reasonably expected to attend a public hearing, an interpreter will be present.

VII. Meetings

All meetings will be publicly announced and be at a handicapped accessible public building and held between the hours of 7:00 AM and 10:00 PM EST.

VIII. Availability of Information to the Public

The CHCDP, any amendments to the plan and the plan's performance report, the AI/AFH and any revisions to the AI/AFH, will be available during normal business hours at the Wyoming City Offices, the Wyoming Public Library and the City's website. The documents will be available in a form accessible to persons with disabilities or limited English proficiency upon request.

IX. Access to Records

The City will provide residents of the community, public agencies and other interested parties with reasonable and timely access to information and records relating to the CHCDP, AI/AFH, and use of assistance under the programs covered by this part during the preceding five years.

X. Technical Assistance

The City will provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance to comment on the CHCDP and AI/AFH, or in

developing proposals for funding assistance under any of the programs covered by the CHCDP, with the level and type of assistance determined by the City.

XI. Complaints

The City will provide a timely, substantive written response to every written resident complaint, within 15 working days, where practicable, with regard to the CHCDP, any amendments to the plan and the plan's performance report, the AI/AFH and any revisions to the AFH.

XII. Use of the Citizen Participation Plan

The City will follow its Citizen Participation Plan.

XIII. Jurisdiction Responsibility

The Department of Housing and Urban Development requirements for resident participation do not restrict the responsibility or authority of the City for the development and execution of its CHCDP and AFH.

Wyoming City Council Amended: May 18, 2020